

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

24-CR-59-RJA-JJM

HADI MATAR,

Defendant.

NOTICE OF MOTION AND MOTION

THE UNITED STATES OF AMERICA, by and through its attorney, Michael DiGiacomo, United States Attorney for the Western District of New York, and Charles M. Kruly, Assistant United States Attorney, moves for a four-day extension of time, through and including June 10, 2025, to respond to the defendant's pretrial motions. The defendant does not object to this motion.

DATED: Buffalo, New York, June 4, 2025.

MICHAEL DIGIACOMO
United States Attorney

BY: *s/CHARLES M. KRULY*
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716-843-5838
Charles.Kruly@usdoj.gov

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HADI MATAR,

Defendant.

DECLARATION

CHARLES M. KRULY, states under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an Assistant United States Attorney for the Western District of New York and am assigned to prosecute this case together with Assistant United States Attorney Timothy C. Lynch. This declaration is submitted in support of the government's motion for a four-day extension of time to respond to the defendant's pretrial motions.

2. The defendant is charged with multiple crimes related to the attempted murder of Salman Rushdie on August 12, 2022. *See* Dkt. 1. The defendant filed pretrial motions seeking various forms of relief on May 23, 2025. *See* Dkt. 28. Under the Court's current scheduling order, the government's response to these motions is due on Friday, June 6, 2025.

3. I recently returned to work following extended personal leave, and my co-counsel, AUSA Timothy Lynch, has been engaged in a lengthy trial before Judge Arcara. *See United States v. Payne*, 19-CR-170-RJA. In light of these other commitments, the government

does not anticipate being able to complete its response to the defendant's pretrial motions by June 6, 2025. The government therefore respectfully requests a four-day extension of time, through and including June 10, 2025, to respond to the defendant's pre-trial motions.

4. Before filing this motion, I consulted with defense counsel, Andrew Brautigam. Mr. Brautigam does not object to this motion.

Respectfully submitted,

MICHAEL DIGIACOMO
United States Attorney

Dated: June 4, 2025
Buffalo, New York

BY: *s/CHARLES M. KRULY*
Assistant United States Attorney
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